

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATURAL RESOURCES MEDIA
& TECHNOLOGY GROUP, LLC,

Plaintiff,

-against-

SNOOP YOUTH FOOTBALL LEAGUE
FOUNDATION, THE FIRM, INC., d/b/a "THE
FIRM," and CONSTANCE SHWARTZ,

Defendants.

Case No. 07 CV 7701 (SAS) (AJP)

Scheduling Order

Conference Date: April 8, 2008

WHEREAS, the Court issued an Order for a Conference in accordance with Fed. R. Civ.

P. 16(b) on March 14, 2008 (the "Order"); and

WHEREAS, the Order requires that the parties jointly prepare and sign a proposed scheduling order containing certain information;

NOW, THEREFORE, the parties hereby submit the following information as required by the Order:

1. The date of the conference is April 8, 2008 and the appearances for the parties are as follows:

The Law Offices of Bradley C. Rosen, Esq. P.C.
by Anastasios Sarikas (AS 2631)
For Plaintiff
23-09 31st Street
Astoria, NY 11105
(718) 545-8866

Steptoe & Johnson, LLP
by Christopher J. Marino
750 Seventh Avenue
Suite 1900
New York, New York 10019
(212) 506-3900

Proskauer Rose LLP
by Alison M. Haddock (AH4350)
1585 Broadway
New York, NY 10036
(212) 969-3334
for Defendant Snoop Youth Football League

2. A concise statement of the issues as they appear are as follows: (1) whether defendant Snoop Youth Football League (“SYFL”) had a binding and enforceable contract with plaintiff Natural Resources Media and Technology Group, LLC (“Natural Resources” or “Plaintiff”); (2) whether the SYFL breached the alleged contract with Plaintiff and failed to indemnify Plaintiff for that alleged breach; (3) whether defendant The Firm, Inc. d/b/a “The Firm” (“The Firm”) tortiously interfered with the alleged contracts that Plaintiff had with its service providers by knowingly disseminating false information that allegedly caused the service providers to terminate their alleged contracts with Plaintiff; (4) whether The Firm defamed Plaintiff by knowingly making false statements of fact of and concerning Plaintiff to third parties and, if so, whether Plaintiff suffered any damages as a result thereof; and (5) whether Axxess Sports – against whom SYFL intends to file a cross-claim – is responsible for any of plaintiff’s damages, if any were suffered.

3. A schedule including:

(a) the names of the persons to be deposed and a schedule of planned depositions:

Constance Schwartz, Beverly Hills, California

Michael D. Ross, Beverly Hills, California

Cordozar Calvin Broadus, Jr. a/k/a “Snoop Dogg,” California

A representative of the SYFL with first hand knowledge of the underlying facts in this litigation, location unknown

Brodie Waters, Jacksonville, Florida

Michael Huyghue, Jacksonville, Florida

Karen Wishart, Washington, D.C.

Rose Katherine Pikney, Washington, D.C.

Darrell Miller, Los Angeles, California

Corey Simmons, New York, New York

It is planned that all depositions will be completed by December 31, 2008

- (b) a schedule for the production of documents, as follows: Rule 26 disclosure

to be completed by April 29, 2008; ^{5/13} all document requests are to be responded to within 30 days of receipt and all document requests and/or ^(K/13)

^{NB} supplemental document requests to be responded to by September 30, 2008.

- (c) each expert's report will be supplied by January 31, 2009, ^{2/31/08} rebuttal reports ^{done}

^{NB} to be served by February 28, 2009; ^{1/14} and each expert's deposition will be completed by March 31, 2009; ^{1/20}

- (d) ^{NB} discovery is to be completed by March 31, 2009; ^{1/20}

- (e) ^{NB} Plaintiff will supply its pre-trial materials to defendants by June 30, 2009; ^{2/13}

- (f) ^{NB} the parties will submit a pre-trial order in a form conforming with the

Court's instructions together with trial briefs and either (1) proposed

findings of fact and conclusions of law for a non-jury trial, or (2) proposed

voir dire questions and proposed jury instructions, for a jury trial by July 31, 2009; ^{2/27} and

- (g) the date for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d),
to be filled in by the Court at the conference, is:

JAN 8, 2009 at 4³⁰

4. A statement of any limitations to be placed on discovery, including any protective or confidentiality orders, shall be provided;

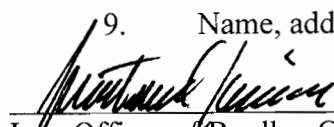
5. A statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement include, but are not limited to, the deposition of Cordozar Calvin Broadus, Jr. a/k/a "Snoop Dogg," and issues concerning production of electronically transmitted communications (*ie* emails);

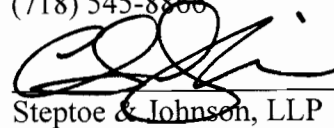
6. Anticipated fields of expert testimony, if any, include, but are not limited to, damages;

7. Anticipated length of trial is one week and it will be to a jury;

8. A statement that the Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires;

9. Name, addresses, phone numbers and signatures of counsel;


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1585 Broadway
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(212) 969-3334
for Defendant Snoop Youth Football League

SO ORDERED:



SHIRA A. SCHEINDLIN
U.S.D.J.

4/8/08